

The Other Three Quarters

NSR Retooling Team

December 18, 2003

Wisconsin Department of Natural Resources

The First Quarter

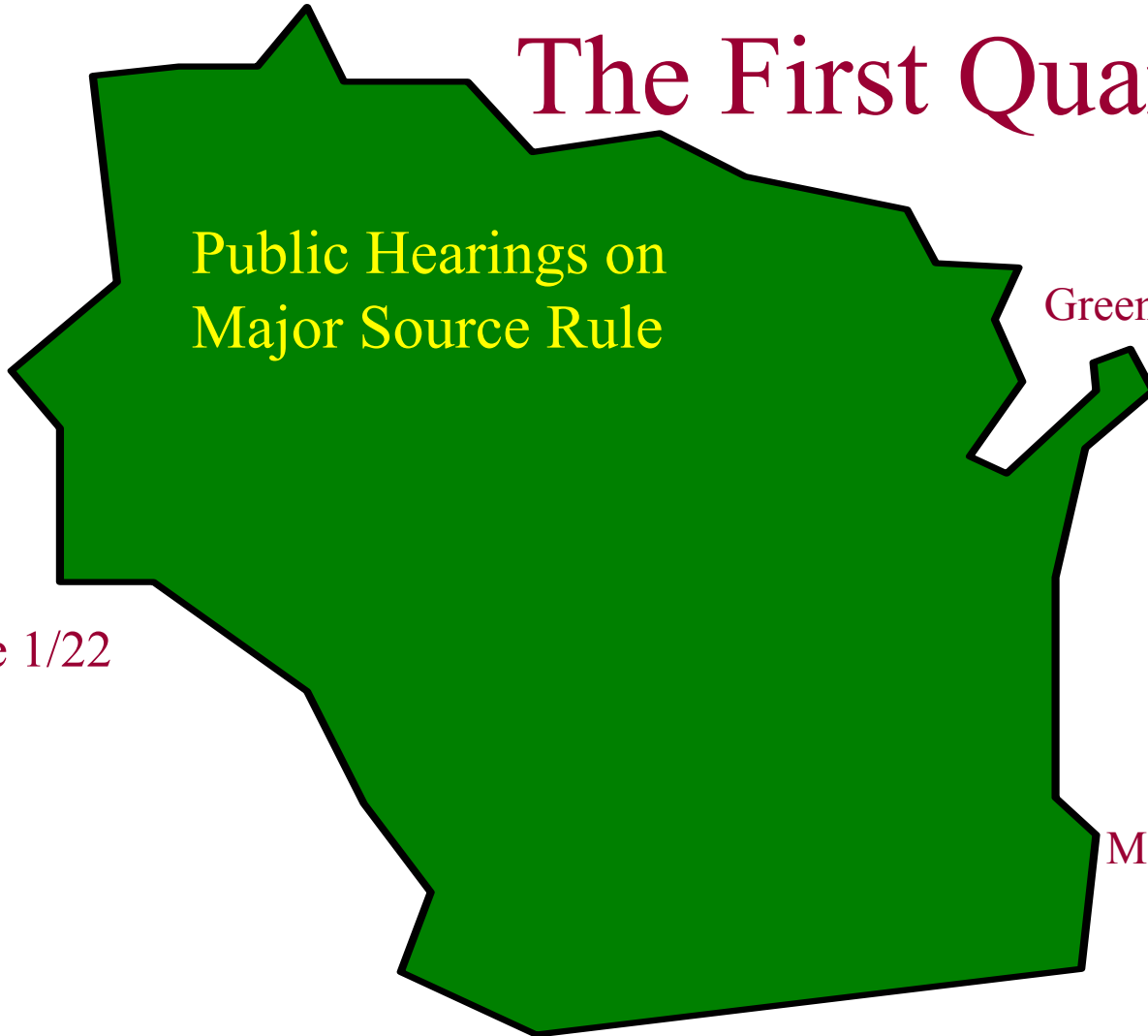
Public Hearings on
Major Source Rule

Green Bay 1/28

Eau Claire 1/22

Milwaukee 1/29

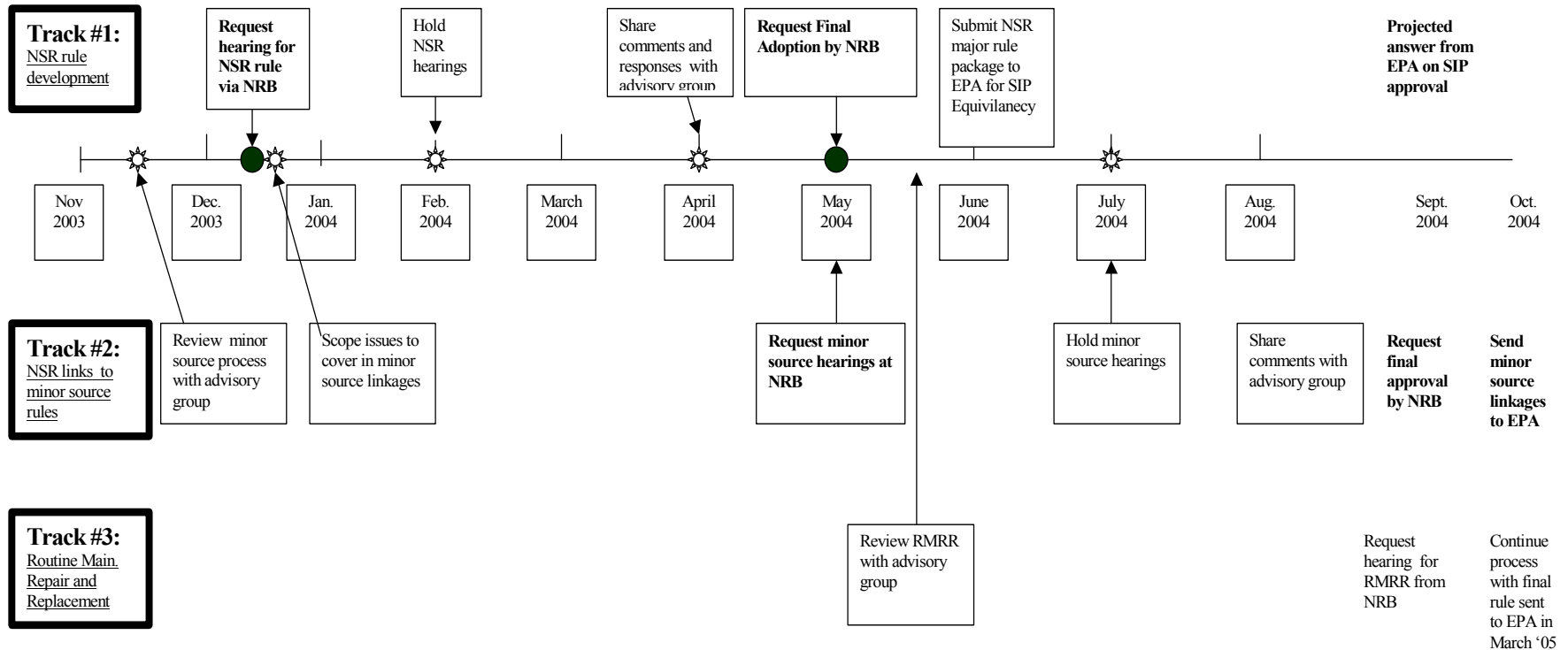
Madison 1/23



Next Steps

DRAFT:::New Source Review (NSR) Retooling: Advisory Group Timeline #2

Basic mission of project: To recommend how federal NSR rules should be adopted and implemented in WI to improve clarity and efficiency of regulation and meet environmental protection needs of citizens.



The Other 3/4

- NR 406 applicability
- NR 407 revision requirements
- Delays as a result

What are our Interest?

- With the Major Source Rule Changes:
 - Clarity/Bright Line
 - Operational flexibility
 - Reduce administrative burden
 - Improve consistency
 - Make programs usable for business
 - Protect public health, specifically improve air resources in nonattainment areas, and protect increment



Interests in 406/407 Interface

Are our interests consistent with major source efforts?

- Clarity/Bright Line
- Operational flexibility
- Reduce administrative burden
- Permit turn around speed
- Improve consistency
- Reduce the cost of complying w/ permit
- Make programs usable for business
- Protect public health, specifically improve air resources in nonattainment areas, and protect increment

What process should we use to approach the rest of the loaf?

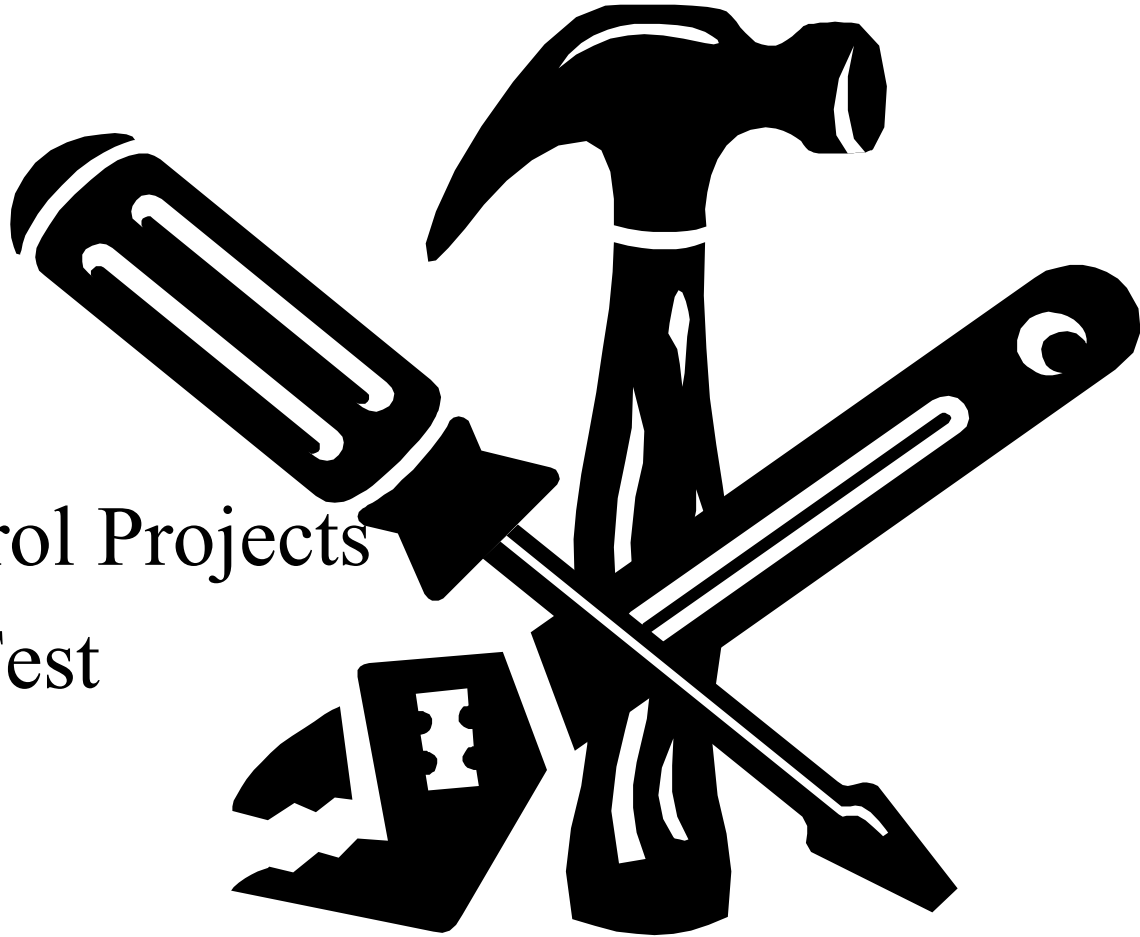
Ideas/Thoughts?

Department Thoughts on the Interface



Interface Dependent on NSR Tool?

- Clean Units
- PALs
- Pollution Control Projects
- Applicability Test



Group Programs Together

- Clean Units, PALs and Pollution Control Projects
- Change would be exempt from NR 406
- Treat as minor revision under Title V
- Facility must demonstrate that change would be protective of air quality in T5 revision submittal
- Project can proceed once application is submitted
- Will require NSR SIP change and Title V program revision

Applicability Test

- More complex than other tests
- Projection does not become limit
- NR 406 thresholds may still be tripped
- Netting scenarios further complicate matters
- This will take some work to sort out